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**MEMO ENDORSED**

March 30, 2022

**BY ECF**

Hon. Laura Taylor Swain  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Constantinescu, et al., 19 CR 651 (LTS)**

Dear Judge Swain:

I am writing on behalf of defendant Theofrastos Lymberatos to respectfully request a modification of the defendant's conditions of release which would permit him to stay out past his curfew for two upcoming events. First, the defendant requests permission to attend his daughter's sweet sixteen party on April 9, 2022 in Queens, New York, with dinner followed by Greek dancing. The defendant anticipates that he would be home by 3 a.m. on April 10 following the celebration, and the extended curfew would permit him to supervise his daughter for the entire evening. Second, the defendant requests permission to attend Greek Orthodox Easter mass on the night of April 23, 2022 at St. Nicholas Church in Queens. The defendant anticipates that he will be home by 1:30 a.m. on the morning of April 24, 2022. Pretrial Services does not object to this application and the government, by AUSA Robert Sobelman, defers to their position.

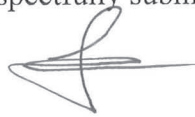
By way of background, Judge Wang released the defendant on October 10, 2019 pursuant to a \$250,000 personal recognizance bond secured by two financially responsible persons and \$250,000 in property, with travel limited to the Southern and Eastern Districts of New York, and additional conditions including home detention and GPS location monitoring. On January 12, 2022, Your Honor sentenced Mr. Lymberatos to a term of imprisonment of 47 months, for which he will surrender to the BOP and begin service on April 28, 2022.

JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application. I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Jeffrey Lichtman', with a stylized, looped initial 'J' and a horizontal line extending to the right.

Jeffrey Lichtman

cc: All counsel (by ECF)  
Pretrial Services (by email)

The requested modification is granted. Dkt. no. 1036 resolved.

SO ORDERED:

/s/ Laura Taylor Swain

HON. LAURA TAYLOR SWAIN, CHIEF U.S.D.J.